

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

**MOUNT VERNON SPECIALITY
INSURANCE COMPANY,
Plaintiff,**

vs.

Case No. 1:23-cv-00393-TWP-MG

**TREVOR WAYNE SIMS;
SIMS INVESTMENTS, LLC;
JOHN SONLEY;
JP SONLEY INVESTMENTS, INC.; and
JACKSON COUNTY BANK,
Defendants.**

AGREED ENTRY

Come now Defendants, John Sonley (“Sonley”), JP Sonley Investments, Inc. (“Sonley Investments”), and Jackson County Bank (“JCBank”), and submit the following agreed entry, showing the agreement of Defendants on each of the following:

1. Sonley and Sonley Investments disclaim any and all interest in the insurance proceeds in the amount of \$236,000.31 paid to the Clerk of this Court by Plaintiff, Mount Vernon Specialty Insurance Company (“Plaintiff”), on April 26, 2023 and agree that such proceeds shall be payable in full to JCBank upon the consent of Plaintiff.
2. JCBank disclaims any and all interest in any further insurance proceeds that may be paid to the Clerk of this Court by Plaintiff, including, but not limited to, the \$221,411.52 in recoverable depreciation, as referenced in rhetorical paragraph twenty-seven (27) in the First Amended Complaint for Interpleader filed by Plaintiff in this matter on March 10, 2023 (Docket No. 7).

3. Sonley, Sonley Investments and JCBank agree to execute any and all documents required by Plaintiff, any other Defendant, this Court, or any other third party, which are necessary to formalize the disclaimers set forth in paragraphs 1, 2 and 3, above.

4. JCBank reserves all rights to assert claims to the \$236,000.31 in insurance proceeds which were paid to the Clerk of this Court on April 26, 2023, by Plaintiff.

5. Sonley and Sonley Investments reserve all rights to assert claims to any future insurance proceeds which may be paid to the Clerk of this Court by Plaintiff, including, but not limited to, the \$221,411.52 in recoverable depreciation, as referenced in rhetorical paragraph twenty-seven (27) in the First Amended Complaint for Interpleader filed by Plaintiff in this matter on March 10, 2023 (Docket No. 7).

Respectfully Submitted,

/s/ Robert William McNevin, Jr.

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/s/ William M. Braman

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CERTIFICATE OF SERVICE

I hereby certify that the above and foregoing Agreed Entry was served on the following counsel of record, at her e-mail address of record, on this 7th day of June, 2024, Ellen J. Brooke, counsel for Plaintiff.

/s/ William M. Braman

William M. Braman